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REMARKS

Claims 26–46 are pending in this application. Currently no claims stand allowed. The Office Action rejects claims 34–37 and 42–46 under 35 U.S.C. § 102(b) as being anticipated by the Adobe FrameMaker+SGML integrated XML document preparation system (hereinafter "FrameMaker+SGML"), as disclosed by "Adobe Frame-Maker+SGML 5.5: Develping SGML Publishing Applications" (1997) (hereinafter *AFM97*), and Charles F. Goldfarb and Paul Prescod, THE XML HANDBOOK 278-295 (1998) (hereinafter *Goldfarb*). Applicants understand this rejection over multiple references to be in accordance with MPEP § 2131.01, with *Goldfarb* the primary reference. The Office Action additionally rejects claims 26–33 and 38–41 under 35 U.S.C. § 103(a) as being obvious over FrameMaker+SGML as disclosed by the two cited references.

Claims 34 and 43 are directed to the use of a markup language document (corresponding to at least one user interface resource file) to dynamically customize the user interface of an executable computer program. Claims 26, 38 and 42 are directed to the use of at least one user interface resource file in a collaborative software development environment in order to create and modify the user interface component of a computer application software product (i.e., an executable program and associated data and object code files). Applicants emphasize again that their claims concern the use of markup language documents to specify and dynamically modify a user interface *for an executable application program*. Applicants maintain that claims 34, 42 and 43 are not anticipated by *Goldfarb* and *AFM97*, and that independent claims 26 and 38 are not obvious over FrameMaker+SGML.

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Goldfarb, in general and in its description of FrameMaker+SGML, does not teach

the use of a markup language document as an aid in collaborative software development.

Goldfarb merely discusses conventional uses of markup language authoring tools in

creating, structuring and editing static informational text documents, uses which of

course have long been known in the art. Creating such a *document*, whether or not more

than one author is involved, and collaboratively developing an *executable software*

application, are not analogous activities in any relevant sense. The Office Action

concedes that FrameMaker+SGML "is not expressly disclosed as being used in a

development environment comprising at least two users." Office Action, p. 12. In fact,

FrameMaker+SGML is not disclosed, expressly or impliedly, as being suitable for use in

software development at all.

Like the previous Office Action, the present Office Action makes much of the

disclosure in *Goldfarb* of FrameMaker+SGML as a system that features "a WYSIWYG

environment that enables interactive editing of a document, allowing the user to see the

rendered result as changes are made to the formatting specification." Office Action, pp.

4-6 *passim*. The changing visual display of a formatted text document, however, is unlike

a changing user interface for an executable application program. In a conventional system

like FrameMaker+SGML, the user interface is fixed. When the visual display changes to

reflect new user input, the user interface of the underlying application does not change;

indeed, the changing visual display reflects the fixed nature of the user interface.

The Office Action argues that "[c]hanging the rendered (WYSIWYG) display

and/or the structured view of the document is, in effect, changing the portion of the

[FrameMaker+SGML] tool with which the user interacts (namely, the manipulatable

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graphical display), and thus the user interface of the [FrameMaker+SGML] tool is changed." Office Action, p. 6. Using the same reasoning, one might contend, absurdly, that with every letter that is input by the user of a plain text editor, the "user interface" of that text editor is "changed." If "user interface" were to be so loosely defined it would lose any useful meaning. In any event, "user interface" is not so defined by those having skill in the art. Rather, a user interface of a particular computer program is not altered by ordinary user input of the very sort that the user interface has been designed to permit. Thus, a utility like FrameMaker+SGML with a WYSIWYG interface has *one* user interface, not an unlimited number of user interfaces.

For the foregoing reasons, claims 26, 34, 42, 38 and 43 are neither anticipated by *Goldfarb* and *AFM97* nor obvious over FrameMaker+SGML as disclosed by these references. Applicants therefore respectfully request that the rejections of these claims be withdrawn. Moreover, because these claims are allowable, the claims that depend from them or otherwise incorporate their elements are allowable for at least the same reasons.

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CONCLUSION

The application is considered to be in good and proper form for allowance, and

the Examiner is respectfully requested to pass this application to issue. If, in the opinion

of the Examiner, a telephone conference would expedite the prosecution of the subject

application, the Examiner is invited to contact the undersigned attorney.

Respectfully submitted,

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